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Claims 2-3, 5-26, 28-29, 31-36, 38-39, and 41-69 are pending in this application. Claims 1, 4, 27, 30, 37, and 40 were previously canceled. Claims 2-3, 5-26, 28-29, 31-36, 38-39, and 41-69 stand rejected.

In accordance with 37 C.F.R. 1.136(a), a two month extension of time is submitted herewith to extend the due date of the response to the Office Action dated March 26, 2003, for the above-identified patent application from June 26, 2006, through and including August 26, 2003. In accordance with 37 C.F.R. 1.17(a)(2), authorization to charge a deposit account in the amount of \$410.00 to cover this extension of time request also is submitted herewith.

The rejection of Claims 2 and 39 under 35 U.S.C. § 103(a) as being unpatentable over Gelber et al. (U.S. Patent No. 6,378,315) in view of Efron et al. (U.S. Patent No. 6,357,243) is respectfully traversed.

Gelber et al. describe a refrigeration system (10) including a plurality of compressors (12) in combination with a main controller (30), wherein the main controller is programmed to execute a control algorithm and includes configuration and logging capabilities. (Col. 3, lines 32-65). The main controller logs and analyzes temperature data, and controls the temperature of a plurality of display cases (22) based on the monitored temperature data. (Col. 6, lines 47-49). The main controller is wirelessly coupled to an Radio Frequency (RF) device. (Col. 6, lines 25-35). Notably, the main controller 30 is separate from the refrigeration system 10 and is not an attached control. Therefore, applicant respectfully traverses the assertion in the office action that "Gelber discloses a control system for a plurality of cooling devices in which an attached control means 30 has a wireless interface 94". Rather, main controller 30 is a remote control.

Efron et al. describe utilizing a power line carrier (PLC) technology and other signal transmission systems such as radio frequency, radar, infrared, visible light, and ultrasound. (Col. 4, lines 23-26).

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Applicant respectfully submits that the Section 103 rejection of the presently pending claims is not a proper rejection. As is well established, obviousness cannot be established by combining the teachings of the cited art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combination. Neither Gelber et al. nor Efron et al., considered alone or in combination, describe or suggest the claimed combination. Furthermore, in contrast to the assertion within the Office Action, Applicant respectfully submits that it would not be obvious to one skilled in the art to combine Gelber et al. with Efron et al., because there is no motivation to combine the references suggested in the art. Additionally, the Examiner has not pointed to any prior art that teaches or suggests to combine the disclosures, other than Applicant's own teaching. Rather, only the conclusory statement that "[i]t would have been obvious to one skilled in the art at the time the invention was made to have modified the system of Gelber et al. such that it included use of infrared communication rather than radio frequency" suggests combining the disclosures.

As the Federal Circuit has recognized, obviousness is not established merely by combining references having different individual elements of pending claims. *Ex parte Levengood*, 28 U.S.P.Q.2d 1300 (Bd. Pat. App. & Inter. 1993). MPEP 2143.01. Rather, there must be some suggestion, outside of Applicant's disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicant's disclosure. *In re Vaeck*, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion nor motivation to combine the prior art disclosures, nor any reasonable expectation of success has been shown.

Furthermore, it is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the cited art so that the claimed invention is rendered obvious. Specifically, one cannot use hindsight reconstruction to pick and choose among isolated disclosures in the art to deprecate the claimed invention. Further, it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art. The present Section 103 rejection appears to be based on a combination of teachings selected from multiple patents in an attempt to arrive at the claimed invention. Specifically Gelber et al. is cited for its teaching of a main

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control coupled to an RF device, and Efron et al. is cited for its teaching of signal transmission systems such as radio frequency, radar, infrared, visible light, and ultrasound. Since there is no teaching nor suggestion in the cited art for the claimed combination, the Section 103 rejection appears to be based on a hindsight reconstruction in which isolated disclosures have been picked and chosen in an attempt to deprecate the present invention. Of course, such a combination is impermissible, and for this reason alone, Applicant respectfully requests that the Section 103 rejection of Claims 2 and 39 be withdrawn.

Further, and to the extent understood, neither Gelber et al. nor Efron et al., alone or in combination, describe or suggest the claimed combination, and as such, the presently pending claims are patentably distinguishable from the cited combination. Specifically, Claim 2 recites a method for assembling a control for use with a cooling device, wherein the method includes "providing an attached control that is configured to control the cooling device; and installing a wireless interface in the attached control, wherein the wireless interface comprises at least one of a satellite interface, an infra-red interface, and a radio frequency (RF) interface".

Neither Gelber et al. nor Efron et al. describe or suggest a method for assembling a control for use with a cooling device, wherein the method includes providing an attached control that is configured to control the cooling device, and installing a wireless interface in the attached control, wherein the wireless interface includes at least one of a satellite interface, an infra-red interface, and an RF interface. Moreover, neither Gelber et al. nor Efron et al. describe or suggest providing an attached control that is configured to control the cooling device. Rather, Gelber et al. describe a main control separated from a refrigerator system, and Efron et al. describe signal transmission systems such as radio frequency, radar, infrared, visible light, and ultrasound. For the reasons set forth above, Claim 2 is submitted to be patentable over Gelber et al. in view of Efron et al.

Claim 39 recites a system for controlling a cooling device, wherein the system includes "an attached control; and a wireless interface operationally coupled to said attached control, said wireless interface comprising at least one of a satellite interface and an infra-red interface."

Neither Gelber et al. nor Efron et al. describe or suggest a system that includes an attached control and a wireless interface operationally coupled to the attached control, wherein

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the wireless interface comprising at least one of a satellite interface and an infra-red interface. Moreover, neither Gelber et al. nor Efron et al. describe or suggest an attached control and a wireless interface operationally coupled to the attached control. Rather, Gelber et al. describe a main control separated from a refrigerator system, and Efron et al. signal transmission systems such as radio frequency, radar, infrared, visible light, and ultrasound. For the reasons set forth above, Claim 39 is submitted to be patentable over Gelber et al. in view of Efron et al.

For at least the reasons set forth above, Applicant respectfully requests that the Section 103 rejection of Claims 2 and 39 be withdrawn.

The rejection of Claims 3, 5-26, 28-29, 31-36, 38, and 41-69 under 35 U.S.C. § 103(a) as being unpatentable over Gelber et al. in view of Efron et al., and further in view of Simon, deceased et al. (U.S. Patent 5,224,648, hereinafter "Simon") is respectfully traversed.

Gelber et al. et al and Efron et al. are described above. Simon describes an HVAC or building automation system (10) whose elements communicate by spread spectrum radio frequency wireless communication. (Col. 2, lines 8-10). The system includes an air conditioner (16) including means for conditioning air (66) and means for supplying conditioned air (70) to a space (72) to be controlled. (Col. 4, lines 64-68).

Applicant respectfully submits that the Section 103 rejection of the presently pending claims is not a proper rejection. As is well established, obviousness cannot be established by combining the teachings of the cited art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combination. None of Gelber et al., Efron et al., and Simon, considered alone or in combination, describe or suggest the claimed combination. Furthermore, in contrast to the assertion within the Office Action, Applicant respectfully submits that it would not be obvious to one skilled in the art to combine Gelber et al. with Efron et al. and Simon, because there is no motivation to combine the references suggested in the art. Additionally, the Examiner has not pointed to any prior art that teaches or suggests to combine the disclosures, other than Applicant's own teaching. Rather, only the conclusory statement that "[i]t would have been obvious to one skilled in the art at the time the invention was made to have modified the system of Gelber et al. such that it included use of wireless communication between

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cooling devices, temperature probes and control means in order to reduce wiring in view of the teaching of Simon" suggests combining the disclosures.

As the Federal Circuit has recognized, obviousness is not established merely by combining references having different individual elements of pending claims. *Ex parte Levengood*, 28 U.S.P.Q.2d 1300 (Bd. Pat. App. & Inter. 1993). MPEP 2143.01. Rather, there must be some suggestion, outside of Applicant's disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicant's disclosure. *In re Vaack*, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion nor motivation to combine the prior art disclosures, nor any reasonable expectation of success has been shown.

Furthermore, it is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the cited art so that the claimed invention is rendered obvious. Specifically, one cannot use hindsight reconstruction to pick and choose among isolated disclosures in the art to deprecate the claimed invention. Further, it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art. The present Section 103 rejection appears to be based on a combination of teachings selected from multiple patents in an attempt to arrive at the claimed invention. Specifically *Gelber et al.* is cited for its teaching of a main control coupled to an RF device, *Efron et al.* is cited for its teaching of signal transmission systems such as radio frequency, radar, infrared, visible light, and ultrasound, and *Simon* is cited for its teaching of an HVAC or building automation system whose elements communicate by spread spectrum RF wireless communication. Since there is no teaching nor suggestion in the cited art for the claimed combination, the Section 103 rejection appears to be based on a hindsight reconstruction in which isolated disclosures have been picked and chosen in an attempt to deprecate the present invention. Of course, such a combination is impermissible, and for this reason alone, Applicant respectfully requests that the Section 103 rejection of Claims 3, 5-26, 28-29, 31-36, 38 and 41-69 be withdrawn.

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Further, and to the extent understood, none of Gelber et al., Efron et al., and Simon, alone or in combination, describe or suggest the claimed combination, and as such, the presently pending claims are patentably distinguishable from the cited combination. Specifically, Claim 3 depends from Claim 2 which recites a method for assembling a control for use with a cooling device, wherein the method includes "providing an attached control that is configured to control the cooling device; and installing a wireless interface in the attached control, wherein the wireless interface comprises at least one of a satellite interface, an infra-red interface, and a radio frequency interface".

None of Gelber et al., Efron et al., and Simon, alone or in combination, describe or suggest a method for assembling a control for use with a cooling device, wherein the method includes providing an attached control that is configured to control the cooling device, and installing a wireless interface in the attached control, wherein the wireless interface includes at least one of a satellite interface, an infra-red interface, and a RF interface. Moreover, none of Gelber et al., Efron et al., and Simon, alone or in combination, describe or suggest providing an attached control that is configured to control the cooling device. Rather, Gelber et al. describe a main control separated from a refrigerator system, Efron et al. signal transmission systems such as radio frequency, radar, infrared, visible light, and ultrasound, and Simon describes an HVAC or building automation system whose elements communicate by spread spectrum RF wireless communication. For the reasons set forth above, Claim 2 is submitted to be patentable over Gelber et al. in view of Efron et al., and further in view of Simon.

Claim 3 depends from independent Claim 2. When the recitations of Claim 3 are considered in combination with the recitations of Claim 2, Applicant submits that dependent Claim 3 likewise is patentable over Gelber et al. in view of Efron et al., and further in view of Simon.

Claim 6 recites a method for controlling a cooling device, wherein the method includes "providing a cooling device comprising at least one of a refrigerator, a refrigerator/freezer, and a freezer; and providing a control device in wireless communication with the cooling device and configured to control the cooling device via an attached control of the cooling device". None of Gelber et al., Efron et al., and Simon, alone or in combination, describe or suggest a method

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including providing a cooling device including at least one of a refrigerator, a refrigerator/freezer, and a freezer, and providing a control device in wireless communication with the cooling device and configured to control the cooling device via an attached control of the cooling device. Rather, Gelber et al. describe a main control separated from a refrigerator system, Efron et al. signal transmission systems such as radio frequency, radar, infrared, visible light, and ultrasound, and Simon describes an HVAC or building automation system whose elements communicate by spread spectrum RF wireless communication. For the reasons set forth above, Claim 6 is submitted to be patentable over Gelber et al. in view of Efron et al., and further in view of Simon.

Claims 5 and 7-8 depend, directly or indirectly, from independent Claim 6. When the recitations of Claims 5 and 7-8 are considered in combination with the recitations of Claim 6, Applicant submits that dependent Claims 5 and 7-8 likewise are patentable over Gelber et al. in view of Efron et al., and further in view of Simon.

Claim 9 recites a method for controlling a cooling device, wherein the method includes "providing a cooling device including an attached control; and providing a control device in wireless communication with the cooling device and configured to control the cooling device via the attached control, wherein the control device includes a memory configured to store data regarding the cooling device". None of Gelber et al., Efron et al., and Simon, alone or in combination, describe or suggest a method including providing a cooling device including an attached control; and providing a control device in wireless communication with the cooling device and configured to control the cooling device via the attached control, wherein the control device includes a memory configured to store data regarding the cooling device. Moreover, none of Gelber et al., Efron et al., and Simon, alone or in combination, describe or suggest a method including providing a control device in wireless communication with the cooling device and configured to control the cooling device via the attached control, wherein the control device includes a memory configured to store data regarding the cooling device. Rather, Gelber et al. describe a main control separated from a refrigerator system, Efron et al. signal transmission systems such as radio frequency, radar, infrared, visible light, and ultrasound, and Simon describes an HVAC or building automation system whose elements communicate by spread

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spectrum RF wireless communication. For the reasons set forth above, Claim 9 is submitted to be patentable over Gelber et al. in view of Efron et al., and further in view of Simon.

Claims 10-22 depend, directly or indirectly, from independent Claim 9. When the recitations of Claims 10-22 are considered in combination with the recitations of Claim 9, Applicant submits that dependent Claims 10-22 likewise are patentable over Gelber et al. in view of Simon.

Claim 23 recites a method for controlling a plurality of cooling devices, wherein the method includes "installing a wireless interface in each cooling device; controlling the cooling devices with a wireless control device; and maintaining a location database that identifies a location for each cooling device". None of Gelber et al., Efron et al., and Simon, alone or in combination, describe or suggest a method including installing a wireless interface in each cooling device, controlling the cooling devices with a wireless control device, and maintaining a location database that identifies a location for each cooling device. Moreover, none of Gelber et al., Efron et al., and Simon, alone or in combination, describe or suggest a method including maintaining a location database that identifies a location for each cooling device. Rather, Gelber et al. describe a main control separated from a refrigerator system, Efron et al. signal transmission systems such as radio frequency, radar, infrared, visible light, and ultrasound, and Simon describes an HVAC or building automation system whose elements communicate by spread spectrum RF wireless communication. For the reasons set forth above, Claim 23 is submitted to be patentable over Gelber et al. in view of Efron et al., and further in view of Simon.

Claims 24-26 and 28 depend, directly or indirectly, from independent Claim 23. When the recitations of Claims 24-26 and 28 are considered in combination with the recitations of Claim 23, Applicant submits that dependent Claims 24-26 and 28 likewise are patentable over Gelber et al. in view of Efron et al., and further in view of Simon.

Claim 29 recites a method for assembling a cooling device, wherein the method includes "providing a wireless interface configured to transmit cooling device data including current temperature and status of at least one of a compressor and an evaporator, and installing the wireless interface in a cooling device such that the cooling device is controllable via wireless

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communication". None of Gelber et al., Efron et al., and Simon, alone or in combination, describe or suggest a method including providing a wireless interface configured to transmit cooling device data including current temperature and status of at least one of a compressor and an evaporator, and installing the wireless interface in a cooling device such that the cooling device is controllable via wireless communication. Moreover, none of Gelber et al., Efron et al., and Simon, alone or in combination, describe or suggest a method including providing a wireless interface configured to transmit cooling device data including current temperature and status of at least one of a compressor and an evaporator. Rather, Gelber et al. describe a main control separated from a refrigerator system, Efron et al. signal transmission systems such as radio frequency, radar, infrared, visible light, and ultrasound, and Simon describes an HVAC or building automation system whose elements communicate by spread spectrum RF wireless communication. For the reasons set forth above, Claim 29 is submitted to be patentable over Gelber et al. in view of Efron et al., and further in view of Simon.

Claims 31-34 depend, directly or indirectly, from independent Claim 29. When the recitations of Claims 31-34 are considered in combination with the recitations of Claim 29, Applicant submits that dependent Claims 31-34 likewise are patentable over Gelber et al. in view of Efron et al., and further in view of Simon.

Claim 35 recites a method for controlling a cooling device including a wireless interface, wherein the method includes "providing a wireless control device; and inputting into the wireless control device at least one defrost parameter regarding at least one of a defrost interval, a defrost duration, and a defrost method for the cooling device". None of Gelber et al., Efron et al., and Simon, alone or in combination, describe or suggest a method including providing a wireless control device, and inputting into the wireless control device at least one defrost parameter regarding at least one of a defrost interval, a defrost duration, and a defrost method for the cooling device. Moreover, none of Gelber et al., Efron et al., and Simon, alone or in combination, describe or suggest a method including inputting into the wireless control device at least one defrost parameter regarding at least one of a defrost interval, a defrost duration, and a defrost method for the cooling device. Rather, Gelber et al. describe a main control separated from a refrigerator system, Efron et al. signal transmission systems such as radio frequency, radar, infrared, visible light, and ultrasound, and Simon describes an HVAC or building

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automation system whose elements communicate by spread spectrum RF wireless communication. For the reasons set forth above, Claim 35 is submitted to be patentable over Gelber et al. in view of Efron et al., and further in view of Simon.

Claims 36 and 38 depend directly from independent Claim 35. When the recitations of Claims 36 and 38 are considered in combination with the recitations of Claim 35, Applicant submits that dependent Claims 36 and 38 likewise are patentable over Gelber et al. in view of Simon.

Claim 39 recites a system for controlling a cooling device, wherein the system includes "an attached control; and a wireless interface operationally coupled to said attached control, said wireless interface comprising at least one of a satellite interface and an infra-red interface". None of Gelber et al., Efron et al., and Simon, alone or in combination, describe or suggest a system including an attached control, and a wireless interface operationally coupled to the attached control, wherein the wireless interface includes at least one of a satellite interface and an infra-red interface. Rather, Gelber et al. describe a main control separated from a refrigerator system, Efron et al. signal transmission systems such as radio frequency, radar, infrared, visible light, and ultrasound, and Simon describes an HVAC or building automation system whose elements communicate by spread spectrum RF wireless communication. For the reasons set forth above, Claim 39 is submitted to be patentable over Gelber et al. in view of Efron et al., and further in view of Simon.

Claim 41 depends directly from independent Claim 39. When the recitations of Claim 41 are considered in combination with the recitations of Claim 39, Applicant submits that dependent Claim 41 likewise is patentable over Gelber et al. in view of Efron et al., and further in view of Simon.

Claim 42 recites a system for cooling product, wherein the system includes "a cooling device comprising at least one of a satellite interface and an infra-red interface; and a control device in wireless communication with said cooling device". None of Gelber et al., Efron et al., and Simon, alone or in combination, describe or suggest a system including a cooling device including at least one of a satellite interface and an infra-red interface, and a control device in wireless communication with the cooling device. Moreover, none of Gelber et al., Efron et al.,

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and Simon, alone or in combination, describe or suggest a system including a cooling device including at least one of a satellite interface and an infra-red interface. Rather, Gelber et al. describe a main control separated from a refrigerator system, Efron et al. signal transmission systems such as radio frequency, radar, infrared, visible light, and ultrasound, and Simon describes an HVAC or building automation system whose elements communicate by spread spectrum RF wireless communication. For the reasons set forth above, Claim 42 is submitted to be patentable over Gelber et al. in view of Efron et al., and further in view of Simon.

Claims 43-46 depend directly from independent Claim 42. When the recitations of Claims 43-46 are considered in combination with the recitations of Claim 42, Applicant submits that dependent Claims 43-46 likewise are patentable over Gelber et al. in view of Efron et al., and further in view of Simon.

Claim 47 recites a system for cooling product, wherein the system includes "a cooling device; and a control device in wireless communication with said cooling device, wherein said control device comprises a memory configured to store data regarding the cooling device therein". None of Gelber et al., Efron et al., and Simon, alone or in combination, describe or suggest a system including a cooling device, and a control device in wireless communication with the cooling device, wherein the control device includes a memory configured to store data regarding the cooling device therein. Moreover, none of Gelber et al., Efron et al., and Simon, alone or in combination, describe or suggest a system including a cooling device and a control device wherein the control device includes a memory configured to store data regarding the cooling device therein. Rather, Gelber et al. describe a main control separated from a refrigerator system, Efron et al. signal transmission systems such as radio frequency, radar, infrared, visible light, and ultrasound, and Simon describes an HVAC or building automation system whose elements communicate by spread spectrum RF wireless communication. For the reasons set forth above, Claim 47 is submitted to be patentable over Gelber et al. in view of Efron et al., and further in view of Simon.

Claims 48-59 depend directly from independent Claim 47. When the recitations of Claims 48-59 are considered in combination with the recitations of Claim 47, Applicant submits

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that dependent Claims 48-59 likewise are patentable over Gelber et al. in view of Efron et al., and further in view of Simon.

Claim 60 recites a cooling system including "a plurality of cooling devices each comprising a wireless interface; and a control device in wireless communication with each said cooling device, wherein said control device comprises an asset owner database that includes data identifying an owner of each said cooling device". None of Gelber et al., Efron et al., and Simon, alone or in combination, describe or suggest a system including a plurality of cooling devices each including a wireless interface; and a control device in wireless communication with each cooling device, wherein the control device includes an asset owner database that includes data identifying an owner of each cooling device. Moreover, none of Gelber et al., Efron et al., and Simon, alone or in combination, describe or suggest a system including a control device that includes an asset owner database that includes data identifying an owner of each cooling device. Rather, Gelber et al. describe a main control separated from a refrigerator system, Efron et al. signal transmission systems such as radio frequency, radar, infrared, visible light, and ultrasound, and Simon describes an HVAC or building automation system whose elements communicate by spread spectrum RF wireless communication. For the reasons set forth above, Claim 60 is submitted to be patentable over Gelber et al. in view of Efron et al., and further in view of Simon.

Claims 61-65 depend directly from independent Claim 60. When the recitations of Claims 61-65 are considered in combination with the recitations of Claim 60, Applicant submits that dependent Claims 61-65 likewise are patentable over Gelber et al. in view of Efron et al., and further in view of Simon.

Claim 66 recites a computer configured to "wirelessly communicate with a cooling device; receive from a user at least one parameter for the cooling device, and wirelessly transmit the received parameter to an attached control of the cooling device". None of Gelber et al., Efron et al., and Simon, alone or in combination, describe or suggest a computer configured to wirelessly communicate with a cooling device, receive from a user at least one parameter for the cooling device, and wirelessly transmit the received parameter to an attached control of the cooling device. Moreover, none of Gelber et al., Efron et al., and Simon, alone or in

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combination, describe or suggest a computer configured to wirelessly transmit the received parameter to an attached control of the cooling device. Rather, Gelber et al. describe a main control separated from a refrigerator system, Efron et al. signal transmission systems such as radio frequency, radar, infrared, visible light, and ultrasound, and Simon describes an HVAC or building automation system whose elements communicate by spread spectrum RF wireless communication. For the reasons set forth above, Claim 66 is submitted to be patentable over Gelber et al. in view of Efron et al., and further in view of Simon.

Claims 67-69 depend directly from independent Claim 66. When the recitations of Claims 67-69 are considered in combination with the recitations of Claim 66, Applicant submits that dependent Claims 67-69 likewise are patentable over Gelber et al. in view of Efron et al., and further in view of Simon.

For the reasons set forth above, Applicant respectfully requests that the Section 103 rejection of Claims 3, 5-26, 28-29, 31-36, 38, and 41-69 be withdrawn.

In view of the foregoing amendments and remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully Submitted,



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